

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re: Cory David Seip and Veronica Seip
f/k/a Veronica Rodriguez
Debtors

CHAPTER 13

BANKRUPTCY CASE NUMBER
18-03113/JJT

JPMorgan Chase Bank, National Association,
Movant,
v.

Cory David Seip and Veronica Seip f/k/a
Veronica Rodriguez,
Respondents/Debtors,

Charles J. DeHart, III, Trustee,
Additional Respondent.

**OBJECTION OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION TO
CONFIRMATION OF DEBTORS' CHAPTER 13 PLAN OF REORGANIZATION**

JPMorgan Chase Bank, National Association (“Movant”), by and through its counsel, Shapiro & DeNardo, LLC, hereby objects to the confirmation of Debtors' Chapter 13 Plan (“Plan”), and in support thereof, avers as follows:

1. On or about July 27, 2018, Debtors filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by Debtors' principal residence located at 241 Ore Street, Bowmanstown, PA 18030.
3. On or about November 7, 2018, Movant filed a Proof of Claim citing arrears in the amount of \$3,584.57, and a total claim in the amount of \$145,029.47.
4. Debtors' Plan calls for the payment to Movant of arrearages in the amount of \$0.00 as they are alleging an attempt to enter into a loan modification agreement.

5. Movant does not object to Debtor applying for a loan modification, but does object as the Plan does not provide when the Debtor would amend their Plan should the loan modification be denied as it is unreasonable.

WHEREFORE, JPMorgan Chase Bank, National Association respectfully requests that confirmation of the Debtors' Plan be denied and for such other relief as this Court deems appropriate.

Respectfully submitted,

Dated: November 26, 2018

S&D File #:18-060491

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